

**Karen Warren**

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**From:** cahlers@aol.com  
**Sent:** Tuesday, August 23, 2022 4:46 PM  
**To:** Karen Warren  
**Subject:** Re: US v. McComber

**CAUTION - EXTERNAL:**

Ms. Warren,

May I please have overnight to consult with my client and respond after court tomorrow. (I should be back in the office by noon.) Until this moment, I understood that the "Brady"/discovery motion (ECF 100) was to be held on August 29, 2022 at 10:00 A.M. The hearing on Tuesday, August 30, 2022 was a hearing on the government's motion in limine. The motion in limine was to be filed by July 22, 2022. It has still not been filed.

Without consulting with my client, my plan was to make legal argument on my motion on Monday, August 29, 2022 at 10:00 A.M. If the government intends to call a witness, I request that we begin as scheduled on Monday, August 29, 2022 at 10:00 A.M. to make certain that the parties and the Court have sufficient time to resolve the matter on Monday, August 29, 2022 with the carry-over day being Tuesday, August 30, 2022.

Clarke Ahlers

-----Original Message-----

**From:** Karen Warren <Karen\_Warren@mdd.uscourts.gov>  
**To:** jefferson.m.gray\_usdoj.gov <jefferson.m.gray@usdoj.gov>; Ellen Hollander <Judge\_Ellen\_Hollander@mdd.uscourts.gov>; cahlers@aol.com <cahlers@aol.com>  
**Cc:** Cooch, Peter (USAMD) <Peter.Cooch2@usdoj.gov>  
**Sent:** Tue, Aug 23, 2022 4:21 pm  
**Subject:** RE: US v. McComber

Mr. Ahlers,

Are you planning to call any witnesses?

Karen Warren  
Judicial Assistant to Judge Hollander  
410-962-0742

-----Original Message-----

**From:** Gray, Jefferson M. (USAMD) <Jefferson.M.Gray@usdoj.gov>  
**Sent:** Tuesday, August 23, 2022 3:57 PM  
**To:** Ellen Hollander <Judge\_Ellen\_Hollander@mdd.uscourts.gov>; cahlers@aol.com  
**Cc:** Karen Warren <Karen\_Warren@mdd.uscourts.gov>; Cooch, Peter (USAMD) <Peter.Cooch2@usdoj.gov>  
**Subject:** RE: US v. McComber

**CAUTION - EXTERNAL:**

Mr. Cooch and I have conferred this morning and agreed that we think it would be helpful to the Court (and perhaps desirable from the defense's standpoint as well) for us to call Kelly Sulewski, the head of the contract records office at the NSA, to testify concerning the maintenance of contract files, what type of material is generally included in a contract file,

and how the copy of the Ironbridge contract file that was produced to the defense was assembled and made available to the prosecution for copying. We anticipate that her testimony on direct would only take around 30 minutes, and our preference would be to proceed starting at 10:00 a.m. on Tuesday morning.

Very Truly Yours,

Jefferson M. Gray / Assistant U.S. Attorney / U.S. Attorney's Office for the District of Maryland / 36 S. Charles Street, 4th Floor, Baltimore, Maryland 21202 / (410) 209-4915

-----Original Message-----

From: Ellen Hollander <[Judge\\_Ellen\\_Hollander@mdd.uscourts.gov](mailto:Judge_Ellen_Hollander@mdd.uscourts.gov)>

Sent: Monday, August 22, 2022 8:18 PM

To: Gray, Jefferson M. (USAMD) <[JGray1@usa.doj.gov](mailto:JGray1@usa.doj.gov)>; [cahlers@aol.com](mailto:cahlers@aol.com)

Cc: Karen Warren <[Karen\\_Warren@mdd.uscourts.gov](mailto:Karen_Warren@mdd.uscourts.gov)>

Subject: US v. McComber

Dear counsel: I received Mr. Gray's letter concerning the upcoming hearing. I am at a judicial workshop, and do not have access to my notes. So, I am now relying on my recollection, rather than my notes.

We are proceeding next week ONLY on the "Brady" motion.

I am assuming that the motion will be argument only, not evidentiary. If so, I am amenable to holding the hearing on 8/30, rather than 8/29. I think I had kept both dates, in case needed. But, if it is argument only, I think that one day should be enough.

If either side disagrees, please advise.

Sent from my iPad

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